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8 Attorney for Material Witnesses GAUDENCIO BARRAGAN-MORALES and
9 SALVADOR ISQUIERDO-ISQUIERDO

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UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(THE HONORABLE CATHY ANN BENCIVENGO)

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UNITED STATES OF AMERICA,	}	Criminal Case No. 07cr 0159 BEN
Plaintiff,	}	Magistrate Case No. 07 mg 3012 CAB
v.	}	DATE: APRIL 17, 2008
FELIPE JASSO-RIOS,	}	TIME: 9:30 AM
Defendant.	}	NOTICE OF MOTION AND MOTION FOR ORDER SETTING VIDEO DEPOSITION OF MATERIAL WITNESSES GAUDENCIO BARRAGAN-MORALES and SALVADOR ISQUIERDA-ISQUIERDA

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TO: KAREN P. HEWITT, United States Attorney;
STEVEN D De SALVO, Assistant United States Attorney; and
JAMES MATTHEW BROWN, ESQ.

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PLEASE TAKE NOTICE that on Thursday, April 17, 2008 at 9:30 A.M. in the Courtroom
of The Honorable Cathy Ann Bencivengo, or as soon as thereafter as counsel may be heard, Material
Witnesses GAUDENCIO BARRAGAN-MORALES and SALVADOR ISQUIERDA-ISQUIERDA, by
and through their counsel, DOROTHY SHELTON, will bring the above entitled Motion.

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MOTION

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Material Witnesses, GAUDENCIO BARRAGAN-MORALES and SALVADOR ISQUIERDA-

1 ISQUIERDA, by and through Counsel, DOROTHY SHELTON, and pursuant to Rule 15(a) of the
2 Federal Rules of Criminal Procedure, and pursuant to 18 U.S.C. Section 3144, move for an Order
3 to secure video depositions of their testimony pending trial, and for an Order for their release from
4 custody immediately thereafter.

5 This Motion will be made on the grounds that the Witnesses are unable to meet any condition
6 of release, and that their testimony can be adequately secured by Deposition, and that detention is not
7 necessary to prevent a failure of Justice, and that further detention imposes a severe hardship on the
8 Witnesses and their family.

9 This Motion will be based upon the Declaration of Attorney DOROTHY SHELTON, the
10 Memorandum of Points and Authorities in support of this Motion herein filed, and all documents and
11 records on file herein, and upon such oral testimony as the Court may deem proper.

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13 Dated: April 4, 2008

14 /s/ Dorothy Shelton
15 DOROTHY SHELTON
16 Attorney for GAUDENCIO BARRAGAN-MORALDS
17 SALVADOR ISQUIERDA-ISQUIERDA
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